

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

COGNIZANT TRIZETTO SOFTWARE
GROUP, INC.,

Plaintiff,

v.

INFOSYS LIMITED,

Defendant.

Case No. 3:24-cv-2158-X

The Honorable Brantley Starr

Magistrate Judge David L. Horan

INFOSYS LIMITED,

Counterclaim Plaintiff,

v.

COGNIZANT TECHNOLOGY SOLUTIONS
CORP. and COGNIZANT TRIZETTO
SOFTWARE GROUP, INC.,

Counterclaim Defendants.

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff and Counterclaim Defendant Cognizant TriZetto Software Group, Inc., Counterclaim Defendant Cognizant Technology Solutions Corp., and Defendant and Counterclaim Plaintiff Infosys Limited (collectively, the “Parties”) respectfully move for entry of the Protective Order attached hereto as Exhibit 1. In support of this joint motion, the Parties state as follows:

Pursuant to Federal Rule of Civil Procedure 26(c), the Parties would like to designate as confidential certain information that they may produce during discovery. Accordingly, the Parties have conferred and agreed upon the terms of the attached Protective Order.

For the foregoing reasons, the Parties respectfully request that the Court grant this joint motion and enter the Protective Order submitted herewith.

Dated: February 26, 2025

Respectfully submitted,

/s/ Brent Caslin

Brent Caslin (*pro hac vice*)
Nick Saros (*pro hac vice*)
Kelly M. Morrison (*pro hac vice*)
JENNER & BLOCK LLP
515 S. Flower Street, Suite 3300
Los Angeles, CA 90071
Tel.: (213) 239-5100
BCaslin@jenner.com
NSaros@jenner.com
KMorrison@jenner.com

Shoba Pillay (*pro hac vice*)
Paul B. Rietema (SBN 24133324)
Laura E. Pelanek (*pro hac vice*)
Lindsey A. Lusk (*pro hac vice*)
JENNER & BLOCK LLP
353 N. Clark Street
Chicago, IL 60654
Tel.: (312) 222-9350
SPillay@jenner.com
PRietema@jenner.com
LPelanek@jenner.com
LLusk@jenner.com

Douglas E. Litvack (*pro hac vice*)
JENNER & BLOCK LLP
1099 New York Avenue, NW
Suite 900
Washington, DC 20001
Tel: (202) 639-6000
DLitvack@jenner.com

*Attorneys for Defendant and Counterclaim
Plaintiff Infosys Limited*

/s/ L. Kieran Kieckhefer

L. Kieran Kieckhefer (*pro hac vice*)
Elizabeth McCloskey (*pro hac vice*)
Christina E. Myrold (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
Tel.: 415.393.8200
kkieckhefer@gibsondunn.com
emccloskey@gibsondunn.com
cmyrold@gibsondunn.com

John T. Cox, III (SBN 24003722)
Betty Yang (SBN 24088690)
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue Suite 2100
Dallas, TX 75201-2923 USA
Tel.: 214.698.3226
byang@gibsondunn.com
tcox@gibsondunn.com

Ahmed ElDessouki (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
200 Park Ave.
New York, NY 10166
Tel.: (212) 351-2345
aeldessouki@gibsondunn.com

*Attorneys for Plaintiff and Counterclaim
Defendant Cognizant TriZetto Software
Group, Inc. and Counterclaim Defendant
Cognizant Technology Solutions Corp.*

CERTIFICATE OF CONFERENCE

Pursuant to Northern District of Texas Local Civil Rule 7.1(b), I certify that on February 26, 2025, I conferred with Laura Pelanek, counsel for Defendant and Counterclaim Plaintiff Infosys Limited (“Infosys”), and she confirmed that Infosys agrees to the relief requested in this motion as well as the Protective Order submitted herewith.

Dated: February 26, 2025

/s/ Christina E. Myrold
Christina E. Myrold

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification of the filing to all counsel of record.

Dated: February 26, 2025

/s/ L. Kieran Kieckhefer
L. Kieran Kieckhefer